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ASSOCIATION OF INTERNATIONAL AUTOMOBILE MANUFACTURERS, INC.
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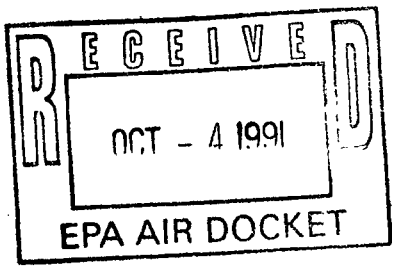
4 October, 1991



Air Docket
Room M-1500 (LE-131)
Environmental Protection Agency
401 M Street S.W.
Washington, D.C. 20460

ATTN: Docket Number A-91-46

Enclosed are the comments of the Association of International Automobile Manufacturers (AIAM) regarding the Ethyl Corporation's application for fuel waiver dated July 12, 1991.

If you have any questions, please contact me.

Sincerely,

Gregory J. Dana
Vice President and
Technical Director

DK:set
Enclosure

STATEMENT OF THE
ASSOCIATION OF INTERNATIONAL AUTOMOBILE MANUFACTURERS, INC.
REGARDING THE
ETHYL CORPORATION'S APPLICATION FOR A
FUEL ADDITIVE WAIVER DATED JULY 12, 1991

On July 12, 1991, the Ethyl Corporation submitted an application for waiver of the prohibition against the introduction into commerce of certain fuels and fuel additives set forth in Section 211(f) of the Clean Air Act. This application seeks a waiver for the use of the additive methylcyclopentadienyl manganese tricarbonyl (MMT).

At the public hearing conducted by EPA on September 12, 1991, the Motor Vehicle Manufacturers Association (MVMA) presented the results of recent testing conducted by the Ford Motor Company. In their testimony, it was reported that test vehicles operated on gasoline with MMT demonstrated a 30 percent increase in hydrocarbon (HC) emission levels after an accumulation of 50,000 miles. After 100,000 miles, emissions levels were reported to be 200-300 percent greater. At the same hearing, a representative from the Toyota Technical Center informed EPA that testing conducted by Toyota has produced results which are consistent with those described by Ford.

As we stated in comments to the last Ethyl waiver request for MMT, any increase in HC emissions caused by fuel formulation is unacceptable. The new "Tier I" tailpipe standards and the California LEV standards require significant reductions in HC levels over current requirements. Reductions in HC emissions from improved fuel formulations will be needed to meet these new requirements, not increases.

The Ethyl Corporation argues that its testing program is adequate and that increases in HC emissions are negligible. We have reviewed the data in question and have concluded that Ethyl is relying on data which is the product of a flawed test protocol. Subsequently, we feel that EPA has no option but to reject the data and deny the waiver application.

In our view, EPA must attempt to uncover why the Ford and Toyota test results are consistent with each other but not with the Ethyl data. It is our opinion that

Ford and Toyota's test results are consistent because they are intimately familiar with the certification regulations and test protocols which have been developed by EPA. This, however, is not the case for Ethyl. We believe that Ethyl's inexperience in conducting such emissions testing has resulted in the development of a seriously flawed test protocol which has in turn produced some serious errors in the data.

A major concern, in our view, is the issue of fuel injector replacement. It is our understanding that in conducting durability testing with its 48 car test fleet, Ethyl replaced fuel injectors on over two-thirds of the test fleet. This is not permitted under EPA's certification regulations and is not representative of real life maintenance practices. We believe that this factor alone invalidates the Ethyl test data and provides EPA with adequate justification for rejecting the Ethyl data set.

Another issue, of equal importance, is the Ethyl decision to use a mileage accumulation fuel not representative of commercially available fuel, per the EPA certification protocol. While one can not predict with certainty the effect this factor has on HC emissions, there is no question that use of the Howell EEE fuel is inconsistent with EPA certification protocol and therefore unacceptable for the purposes of the waiver application in question.

In summary, we believe that EPA has no choice but to reject the Ethyl data and subsequently deny Ethyl's application for fuel waiver.